

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11**
VOYAGER DIGITAL HOLDINGS, INC., et al. : **Case No. 22-10943 (MEW)**
Debtors.¹ : **(Jointly Administered)**
: **Re: Docket No. 690**

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**NOTICE OF CROSS-MOTION OF METROPOLITAN COMMERCIAL BANK FOR
RELIEF FROM THE AUTOMATIC STAY TO PERMIT SETOFF**

PLEASE TAKE NOTICE that on December 7, 2022, Metropolitan Commercial Bank (“MC Bank”) filed the *Cross-Motion for Relief from the Automatic Stay to Permit Setoff* (the “Cross-Motion”).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Cross-Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) by registered users of the Court’s electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served so as to be actually received by the deadline to be set by the Court, by (i) the entities on the Master Service

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

List available on the case website of the above-captioned debtors and debtors in possession at <https://cases.stretto.com/Voyager> and (ii) any person or entity with a particularized interest in the subject matter of the Cross-Motion.

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the hearing to be scheduled on the Cross-Motion. Failure to file a timely objection may result in entry of a final order granting the Cross-Motion as requested by Metropolitan Commercial Bank.

PLEASE TAKE FURTHER NOTICE that copies of the Cross-Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the Cross-Motion and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that a hearing has not yet been scheduled on the Cross-Motion. A subsequent notice will be provided once the Court schedules a hearing.

Dated: December 7, 2022
New York, New York

Respectfully submitted,

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